

SEANAH J. DIXON 62866

Name and Inmate Booking Number

HIGH DESERT STATE PRISON

Place of Confinement

POST OFFICE BOX 650

Mailing Address

INDIAN SPRINGS, NV, 89070

City, State, Zip Code

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

SEANAH J. DIXON, Plaintiff

vs.

(1) STACY BARRETT,  
(2) ROBERT JARRETT,  
(3) ROBERT ASHCRAFT,  
(4) WILLIAM OBLAK,  
(5) UNKNOWN GARCIA, ET. AL.,  
Defendant(s).

Case No. \_\_\_\_\_  
(To be supplied by Clerk of Court)

**\*EMERGENCY\***  
CIVIL RIGHTS COMPLAINT  
BY AN INMATE

Original Complaint  
 First Amended Complaint  
 Second Amended Complaint

Jury Trial Demanded

A. JURISDICTION

1) This Court has jurisdiction over this action pursuant to:

28 U.S.C. § 1343(a)(3); 42 U.S.C. § 1983

28 U.S.C. § 1331; *Bivens v. Six Unknown Named Agents*, 403 U.S. 388 (1971)

Other: \_\_\_\_\_

2) Institution/city where Plaintiff currently resides: HIGH DESERT STATE PRISON

3) Institution/city where violation(s) occurred: HIGH DESERT STATE PRISON & ELY PRISON

**B. DEFENDANTS**

1. Name of first Defendant: STACY BARRETT. The first Defendant is employed as: CASE WORKER SUPERVISOR at HIGH DESERT STATE PRISON ("HDSP").  
(Position of Title) (Institution)
2. Name of second Defendant: ROBERT JARRETT. The second Defendant is employed as: SENIOR CORRECTIONS OFFICER ("SCO") at HDSP.  
(Position of Title) (Institution)
3. Name of third Defendant: ROBERT ASHCRAFT. The third Defendant is employed as: SCO at HDSP.  
(Position of Title) (Institution)
4. Name of fourth Defendant: WILLIAM OBLAK. The fourth Defendant is employed as: SCO at HDSP.  
(Position of Title) (Institution)
5. Name of fifth Defendant: UNKNOWN SCO GARCIA. The fifth Defendant is employed as: SCO @ HDSP INTAKE/ PROPERTY at HDSP.  
(Position of Title) (Institution)

If you name more than five Defendants, answer the questions listed above for each additional Defendant on a separate page.

**C. NATURE OF THE CASE**

Briefly state the background of your case.

THIS IS A "550" PRISONER CIVIL RIGHTS ACTION FOR UNCONSTITUTIONAL RETALIATION AND DELIBERATE INDIFFERENCE TO SERIOUS MEDICAL NEEDS UNDER THE 1ST AND 8 TH AMENDMENTS TO THE UNITED STATES CONSTITUTION.

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6). SCO MARTINEZ IS EMPLOYED AS SCO AT HDSP.

7). SCO STEWART IS EMPLOYED AS SCO AT HDSP.

8). CALVIN JOHNSON IS EMPLOYED AS WARDEN AT HDSP.

9). D. ONTIVEROS IS EMPLOYED AS LIEUTENANT AT HDSP.

10). MICHAEL MINEV IS EMPLOYED AS NDOC MEDICAL DIRECTOR.

11). BENITO GUTIERREZ IS EMPLOYED AS DIRECTOR OF NURSING AT HDSP.

12). SANDRA GOBLER IS EMPLOYED AS DIRECTOR OF NURSING AT HDSP.

13). STATE OF NEVADA EX REL IS A SOVEREIGN STATE.

14). R. VALLE IS EMPLOYED AS CORRECTIONS OFFICER ("CO") AT HDSP.

15). EDGAR LOPEZ-MAYA IS EMPLOYED AS A CO AT HDSP.

16). TERENCE JACKSON IS EMPLOYED AS A CO AT HDSP.

17). ELLERY PAYFORD IS EMPLOYED AS A CO AT HDSP.

18). S. SALKOFF IS EMPLOYED AS A CO AT HDSP.

19). FRED ZABEL IS EMPLOYED AS A CO AT HDSP.

20). UNKNOWN GISTEN IS EMPLOYED AS A CO AT HDSP.

21). UNKNOWN RONOS IS EMPLOYED AS A CO AT HDSP.

22). UNKNOWN EMIL IS EMPLOYED AS A CO AT HDSP.

23). DAVID RIVAS IS EMPLOYED AS A PHYSICIAN AT HDSP.

24). WILSON BERNALLES WAS A PHYSICIAN EMPLOYED AT HDSP.

25). D.A. JONES IS A CHARGE NURSE III ("CNIII") AT ELY STATE PRISON ("ESP").

26). JUSTIN IS A CNIII AT HDSP.

27). JOHN/JANE DOES 1 THRU 75, INCLUSIVE, ARE VARIOUS HDSP UNIDENTIFIED NURSES AND PRIMARY CARE PHYSICIANS ("PCP") WHO ARE MATERIAL TO THIS ACTION BUT WHOMS IDENTITIES CANNOT YET BE ASCERTAINED FOR THIS ACTION DUE TO FRAUDULENT CONCEALMENT.

**D. CAUSE(S) OF ACTION**

**CLAIM 1**

1. State the constitutional or other federal civil right that was violated: EIGHTH AMENDMENT  
TO THE UNITED STATES CONSTITUTION.

2. **Claim 1.** Identify the issue involved. Check **only one**. State additional issues in separate claims.

<input type="checkbox"/> Basic necessities	<input checked="" type="checkbox"/> Medical care	<input type="checkbox"/> Mail
<input type="checkbox"/> Disciplinary proceedings	<input type="checkbox"/> Exercise of religion	<input type="checkbox"/> Property
<input type="checkbox"/> Access to the court	<input type="checkbox"/> Excessive force by officer	<input type="checkbox"/> Retaliation
<input type="checkbox"/> Threat to safety	<input type="checkbox"/> Other: _____	

3. **Date(s) or date range** of when the violation occurred: 09/13/21 THRU CURRENT.

4. **Supporting Facts:** State as briefly as possible the FACTS supporting Claim 1. Describe exactly what **each specific defendant (by name)** did to violate your rights. State the facts clearly in your own words without citing legal authority or argument.

5. MS. DIXON<sup>1</sup> HAS ACUTE LIFE-THREATENING MEDICAL CONDITIONS INCLUDING FLUCTUATING HEART CONDITION, COPD, ASTHMA, ANXIETY, POTENTIALLY CANCEROUS PENILE CYST, HISTORY OF KIDNEY FAILURE, HEPATITIS C, LEFT ARM NUMBNESS, BLOOD CLOTS, BLOCKED ARTERIES, CRANIAL AND LEFT ARM TINGLING SENSATIONS, HIGH BLOOD PRESSURE ("HBP"), SPINAL INJURIES, POSSIBLE THROAT, COLON AND LUNG CANCER<sup>2</sup>, CONSTANT EXPELLING OF BLOOD FROM INTERNAL BLEEDING, BLOOD IN STOOL, BREATHING DIFFICULTIES AND A UNASCERTAINED NEUROLOGICAL CONDITION.

6. THESE CONDITIONS CAUSE CONSTANT FATIGUE, WEAKNESS, SYNCOPE, PERFUSE SWEATING, LACK OF APPETITE, DIFFICULTIES EATING, SWALLOWING AND SLEEPING, HEART, CHEST AND HEAD PAINS, BLURRED VISION, ELEVATED STROKE RISKS, CONSTANT PERSISTENT AND INTOLERABLY EXCRUCIATING HEADACHES AND AGONIZING DISTRIBUTED PAINS THROUGH OUT HER ENTIRE BODY.

7. AS A TRANSGENDER DIAGNOSED WITH GENDER IDENTITY DISORDER ("GID")/ GENDER DYSPHORIA ("GD") PROSPECTING FEMININE CHARACTERISTICS, SHE HAS BEEN AND REMAINS ON HORMONE REPLACEMENT THERAPY ("HRT") TYPICALLY WARRANTING ENDOCRINOLOGY SPECIALTY MONITORING AND PERIODIC CONSULTS.

8. SHE'S BEEN CONSULTED WITH CARDIOLOGY FOR HER HEART CONDITION.

HOWEVER, NOT ALL SPECIALTY ORDERS HAVE BEEN ADHERED TO BY NDOC AND MEDICAL DEFENDANTS. MS. DIXON IS THE EPITOME OF A CHRONIC CARE PATIENT ("CCP") AND THE EVENTS TO FOLLOW ARE THE EPITOME OF DELIBERATE INDIFFERENCE.

9. PURSUANT TO THE INTERSTATE COMPACT AGREEMENT, SHE TRANSFERRED TO CALIFORNIA DEPARTMENT OF CORRECTIONS AND REHABILITATION ("CDCR") FOR 16 YEARS WHERE SHE MET HER ASSISTING INMATE TONY A. WHITE NDOC NO. 1214172. IN CDCR, SHE WAS COMPREHENSIVELY AND CONSISTENTLY EVALUATED, MONITORED AND TREATED FOR HER MANY MEDICAL MAULS. SHE FREQUENTLY CONSULTED WITH ENDOCRINOLOGY FOR HER HPT AND ROUTINE TESTING INCLUDED FREQUENT BLOOD WORKS.

10. ULTIMATELY, ON AND ABOUT MARCH 30, 2016, SHE RETURNED TO THE NEVADA DEPARTMENT OF CORRECTIONS ("NDOC"). HER CDCR UNIT HEALTH RECORD ("UHR") ACCOMPANIED HER RETURN PLACING NDOC ON NOTICE OF HER CONTINUITY OF CARE NEED AND ROUTINE FOLLOW UPS WITH PRIMARY CARE PROVIDERS ("PCP") AND SPECIALTY CLINICS INCLUDING NEUROLOGY, ENDOCRINOLOGY AND CARDIOLOGY. SHE'S REMAINED IN NDOC TODATE.

11. GIVEN CHRONIC NATURES OF HER AILMENTS, SINCE MARCH 30, 2016 SHE'S BEEN REGARDED A CCP UNDER DEFENDANT MINEV'S MEDICAL DIRECTIVES WHICH GOVERN PROVISION OF MEDICAL CARE IN ALL NDOC FACILITIES INCLUDING HDSP AND ESP. TODATE, SHE'S SUBMITTED A SMORGASBORD OF MEDICAL KITE AND SERVICE REPORT REQUESTS ("MKSRS"), STANDARD REQUESTS AND COMPLAINTS, BOTH FORMAL AND INFORMAL TO DEFENDANTS MINEV, JOHN-SON, JONES, GUTIERREZ, GOBLER, RIVAS, BERNALLES, JUSTIN AND VARIOUS UNIDENTIFIED DOES AND HAS SUMMONED "MANDOW" EMERGENCY MEDICAL SUMMONS CONSISTENTLY.

1. MS. DIXON IS A MALE-TO-FEMALE TRANSGENDER AND SEEKS THAT THE COURT AND ALL PARTIES RESPECTFULLY CONFORM TO PROPER PRONOUN ADDRESSING HER IN THE FEMININE CONTEXT. SEE SCHWENK V. HARTFORD, 204 F.3D 1187 (9TH CIR. 2000).
2. CONDITIONS IN WHICH ANY REASONABLE PERSON OF NORMAL SENSIBILITY WOULD AGREE WARRANTS "EARLY" NOT DELAYED DETECTION/INTERVENTION FOR FAVORABLE PROGNOSIS.

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12, MOST, IF NOT ALL, HAVE FAILED ON DEAF EARS OR RESULTED IN PROFORMA  
TREATMENT. OF THE FEW WHICH PCP ORDERS DID MATERIALIZE IN EFFORTS TO  
RULE OUT, DETECT ETIOLOGY AND TREAT THE CONDITIONS, THESE ORDERS AND  
PORTIONS OF CARE HAVE BEEN DEFIANTLY AND NONCHALANTLY REBUFFED,  
IGNORED AND SUBJECT TO EGREGIOUS UNREASONABLE AND PROTRACTED DELAYS  
TO HER DETRIMENT. SHE'S CONSISTENTLY TOLD "BE PATIENT," "NOT AN EMER-  
GENCY"<sup>31</sup>, AS HER HEALTH RAPIDLY DETERIORATES WHILE A POSSIBLE DANGEROUS  
CULPRIT CONSUMES HER AND AS DEFENDANTS PROCRASITATE IN DELIVERY OF  
CONSTITUTIONAL TREATMENT TO ERADICATE HER WANTON SUFFERINGS AND  
TORMENTS.

13. SOME OF HER COMPLAINTS AND MKSP's HAVE ELICITED THE MOST  
ABSURD AND INSENSITIVE RESPONSES FROM MEDICAL DEFENDANTS. IN  
ADDITION TO THEIR POSSESSION OF HER CDCR UHR, SHE HAS RELENT-  
LESSLY ADVISED MEDICAL DEFENDANTS OF HER CONDITIONS PLACING THEM  
ON NOTICE RESPECTIVELY AS FOLLOWS:

<u>DATE</u>	<u>CONDITION (S)</u>
03/30/16	ASTHMA, COPD, PENILE CYST, HBP, HEP C, BLURRED VISION, ABDOMEN PAIN, FAINT SPELLS, HEAD INJURIES, BREATHING DIFFICULTIES, STOMACH ULCERS AND HISTORY OF KIDNEY FAILURE;
12/03/19	ANXIETY
04/20/20	BACK, NECK, LUNG PAINS
06/25/20	HEREDITARY CANCER
08/11/20	ANAL PAINS
10/09/20	ARM/ NECK NUMBNESS
02/19/21	EXCRUCIATING HEADACHES
02/25/21	BLOCKED ARTERIES
04/09/21	BLOOD CLOTS

3. NO PROVISION OF AR 740 EXPRESSLY DEFINES EXACTLY WHAT CIRCUMSTANCES CON-  
STITUTE AN EMERGENCY GRIEVABLE ISSUE NOR DOES ANY PROVISION PRECLUDE VOMIT-  
ING BLOOD, BLOOD IN STOOL, HEART AND CHEST PAINS, BREATHING DIFFICULTIES  
OR POSSIBLE PROGRESSIVE CANCER AS BEING CONSIDERED A EMERGENCY BASIS.  
NONETHELESS, ABSENT HESITATION AND WITH HASTE MEDICAL DEFENDANTS  
INDISCRIMINATELY CITE AR 740 TO CONCEAL THEIR LACK OF WILLINGNESS  
IN PROVIDING HUMANE AND CONSTITUTIONAL CARE AND AS A MEDICAL TREAT-  
MENT BUFFER.

14. VARIOUS OF THESE ACUTE AILMENTS CARRY POTENTIALLY CATASTROPHIC AND FATAL CONSEQUENCES AND NOT DIAGNOSED, CONFRONTED OR CLINICALLY INVESTIGATED, ONLY AGGRESSIVELY PROGRESS AND FESTER TO HER DISEMPTION. THEY CAUSE EXTREME PHYSICAL AND PSYCHOLOGICAL PAIN, WANTON SUFFERING, GREAT ANXIETY AND DISTRESS AND ARE SUBSTANTIALLY TRAUMATIC LEAVING MS. DIXON IN CONSTANT AGONY, TORMENT, FEAR AND TERROR OF IMPENDING DEATH AND/OR SERIOUS BODILY INJURY. THEY HAVE A DELETERIOUS IMPACT ON HER HEALTH, DAILY ACTIVITIES AND LIFE EXPECTANCY.

15. AMONGST A LITANY OF DIAGNOSTIC TESTINGS ORDERED AND NOT PERFORMED TO DATE ARE A AFP CANCER MARKER TEST, MRI, CT SCAN, NECK X-RAY, BREATHING TESTS, FOLLOW UP HEP C MONITORING, NEUROLOGY REFERRAL, BLOOD PRESSURE CHECKS, COLONOSCOPY, ENDOSCOPY AND LABS ALL ORDERED TO DETECT/TREAT POSSIBLE HEREDITARY COLON, LUNG, THROAT CANCER, ADDRESS HER SPINAL/NECK CONDITIONS AS WELL AS OTHER CONDITIONS.

16. AFTER RETURN TO NDOC SHE SOUGHT ACCESS TO ENDOCRINOLOGY EARLY AS APRIL 15, 2017. PRIOR TO HER MARCH 21, 2021 TRANSFER TO ESP AND WHILE AT NORTHERN NEVADA CORRECTIONAL CENTER ("NNCC") AND LOVELOCK CORRECTIONAL CENTER ("LCC"), ON AUGUST 14, 2016 SHE BROKE HER RIGHT HAND RADIUS BONE WARRANTING EMERGENCY SURGERY AND METALLIC HARDWARE BEING INSTALLED ALONG WITH A RIGHT WRIST STABILITY BRACE. BY APRIL 20, 2020 SHE WAS DIAGNOSED WITH A POTENTIALLY FATAL CONDITION KNOWN AS "HYPERLIPIDEMIA." TESTS OF MAY 21ST AND OCTOBER 5TH, 2020 CONFIRMED HER AFFLICTION WITH COPD/ASTHMA. RESULTS OF JUNE 25, 2020 RETURNED POSITIVE FOR BLOOD IN HER STOOL THREE. BY APRIL 20TH AND NOVEMBER 18TH, 2020,

17. SHE TRANSFERRED TO ESP ON MARCH 21, 2021. AT ESP SHE RECEIVED SOME DEGREE OF DILIGENT AND REASONABLE CARE AT A "LOWER LEVEL OF CARE." IN HER 8 MONTHS THERE SHE CONSULTED WITH PCP'S 6-9 TIMES.

18. ON JUNE 08, 2021 ORDERS ISSUED FOR A CT SCAN, MRI AND X-RAY OF HER C-SPINE AND NECK AND FOR A COLONOSCOPY AND ENDOSCOPY IN EFFORTS TO DETECT CANCER. SHE WAS SUMMONED JULY 20, 2021 TO TRANSFER TO HDSP FOR THE PERFORMANCE OF THE ENDOSCOPY AND COLONOSCOPY AS A "ADD-ON." HOWEVER, DUE TO LEGITIMATE SAFETY CONCERN'S SHE DECLINED THAT TRANSFER IN THE INTEREST OF HER SAFETY AND LIFE.

19. AS A PROTECTIVE CUSTODY ("PC") INMATE, NDOC'S "ADD-ON" TRANSPORT PRACTICES OF MIXING GENERAL POPULATION ("GP") WITH PC POSED A DIRECT IMPIMENT THREAT TO MS. DIXON WHO WAS VISIBLY A TARGET OF GP'S. HISTORICALLY, THESE TRANSFERS RESULTED IN SEVERE ATTACKS AND IN SOME INSTANCES MURDER DURING TRANSPORT. GIVEN MS. DIXON'S TRANSGENDER STATUS, HRT AND LIKELY TARGET OF ASSAULT, SHE DECLINED. HER FEARS WERE WELL-FOUNDED AS PC INMATE CLINT ROWE WHO ELECTED TO PROCEED WITH THE TRANSPORT MS. DIXON WAS SCHEDULED TO ATTEND, WAS SAVAGELY BEATEN.

20. ON JULY 23, 2021 SHE FILED GRIEVANCE NO. 20063125730 COMPLAINING OF DEFENDANT'S FAILURE TO TREAT HER COPD/ASTHMA. DEFENDANT JONES GRANTED THE GRIEVANCE ON SEPTEMBER 13, 2021. HOWEVER, JONES NEVER SET IN MOTION NOR COORDINATED TESTING AND/OR TREATMENT OF HER COPD/ASTHMA AND THE GRANT WAS MERE LIP-SERVICE TO APPEASE MS. DIXON.

21. SHE ALSO FILED GRIEVANCE NO. 20063125726 CHALLENGING THE

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TRANSFER CIRCUMSTANCES DEFENDANTS ATTEMPTED TO SUBJECT HER TO  
BY FN WILHEH TO OBTAIN HER CRUCIALLY NEEDED ENDOSCOPY/COLONOSCOPY  
PROCEDURES SEEKING RESCHEDULING UNDER SAFER TRANSPORT CONDITIONS.

22. ON AUGUST 17, 2021 SHE WAS PLACED ON BACLOFEN. A NEUROLOGY  
CONSULT AND BREATHING TESTS WERE ORDERED. BACLOFEN PROVIDED  
SOME DEGREE OF RELIEF FROM NECK/BACK PAINS. ON SEPTEMBER 01,  
2021 A HEP C PROTOCOL WAS IMPLEMENTED TO TREAT THAT CONDITION.  
HOWEVER, MULTIPLE POST-TREATMENT ORDERS RELATING TO TREATMENT  
WERE SIMPLY REBUFFED BY ESP AND HDSP MEDICAL STAFF. ON SEPT-  
EMBER 15, 2021 A AFP CANCER MARKER TEST WAS ORDERED BUT NOT  
ADHERED TO. ON OCTOBER 26, 2021 ANOTHER NEUROLOGY REFERRAL AND CT  
SCAN WERE ORDERED AND SHE AGAIN SOUGHT THAT THE COLONOSCOPY  
AND ENDOSCOPY PROCEDURES BE RESCHEDULED.

23. BY EARLY NOVEMBER 2021, DUE TO CONTINUED HEART PROBLEMS, SHE WAS  
FITTED/ MONITORED WITH A HOLTER MONITOR. BY NOVEMBER 04, 2021  
PCPS WERE UNSETTLED BY DISTURBING RESULTS. A CARDIOLOGIST IMMEDIATELY  
DISCONTINUED PROPRANOLOL RELATED TO BRADYCARDIA AND CONTRA-  
INDICATORS. AN IMMEDIATE TRANSPORT TO HDSP WAS WARRANTED FOR  
"URGENT", "IMMEDIATE", "STAT" AND "ASAP" CARDIOLOGY CONSULT AND  
TO PURPORTEDLY PROVIDE A "HIGHER" LEVEL OF CARE ("LOC"). UPON  
THIS TRANSFER HER LOC URGENCY ON A 1-5 SCALE WAS "1" BEING THE  
SEVEREST.

24. UPON ARRIVAL TO HDSP ON NOVEMBER 05, 2021, THE TRANSFER/ RECEIVING  
SUMMARY COMPLETED BY FN TERESA STARK OF ESP PUT GREAT EMPHASIS ON  
PLAINTIFF'S URGENT AND DIRE MEDICAL STATE AND STATUS USING TERMS  
AS "STAT", "URGENT", "IMMEDIATE NEED", AND "ASAP".

25. HDSP IS A 4000 PRISONER FACILITY. WHILE OFFICERS ARE MAN-

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DATED TO CLAD VISIBLE NAME PLATES, THIS ISN'T, NOR HAS IT EVER  
BEEN, PRACTICE OF MEDICAL STAFF MAKING THEM FUNCTIONALLY EQUIVA-  
LENT OF GHOSTS OPERATING IN THE SHADOWS AND RENDERING OFFENDED  
PRISONERS SUCH AS MS. DIXON INCAPABLE OF IDENTIFYING THEIR MED-  
ICAL ABUSERS FOR LEGAL AND ACCOUNTABILITY PURPOSES<sup>4/</sup>.

26. PRIOR TO, CONTEMPORANEOUS WITH AND SUBSEQUENT TO MS. DIXON'S  
ARRIVAL AT HDSP, MEDICAL DELIVERY WAS IN A CONSTITUTIONAL CRISIS,  
WAS DEPLOYABLE AND ITS MEDICAL DEPARTMENT OPERATED UNDER COMPLETE  
DYSFUNCTION, DISARRAY AND DISORGANIZATION TO PRISONERS DETERIMENT.  
IT OFFERS NO SICK CALLS BY NURSES TO REMEDY EASILY TREATABLE CON-  
DITIONS UNWORTHY AND UNNECESSARY OF PCP CONSULT. IT SOLELY STAFFED  
3 PCPS TO CARE FOR A POPULATION OF 4000 PRISONERS. AFTER FIRING  
DR. BERNALES DUE TO FRAUD, IT SOLELY STAFFS DR. RIVAS TO CARE  
FOR IT'S SWELLING POPULATION.

27. ITS PHARMACY FAILS TO RETAIN FLOOR STOCK OF ESSENTIAL LIFE-  
SUSTAINING MEDICATIONS TO ALLEVIATE CLEARLY FORESEEABLE AND  
PREDICTABLE INTERRUPTIONS IN INMATE ESSENTIAL MEDICATION  
REGIMENS AND SUFFERINGS. RATHER, IT RELIES AND IS DEPENDANT  
ON FILLING/REFILLING PRESCRIPTIONS AT A OFF-SITE CENTRAL  
PHARMACY ROUTINELY LEAVING INMATES, SUCH AS MS. DIXON, LANQUISH-  
ING UNMEDICATED AND SUFFERING DURING REFILLS FOR WEEKS ON  
EDGE AND IN SOME CASES MONTHS, DESPITE THE SEVERITY OF THEIR  
AILMENTS. DUE TO SHORTAGE OF PCPS AND NURSES, PATIENTS SUCH AS  
MS. DIXON WITH SEVERE AND INTOLERABLY PAINFUL CONDITIONS AND  
POSSIBLE CANCER, LANQUISH FOR UPWARDS OF 6 MONTHS BEFORE SEE-  
ING A PCP, IF AT ALL.

4. THIS IS PRECISELY WHY PLAINTIFF PROPORTIONATELY ENLISTS ALMOST ALL  
MEDICAL DEFENDANTS BY DOB PSEUDONYMS.

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28. AS DIRECTOR OF MEDICAL DIVISION MINEV IS RESPONSIBLE FOR HIRING AND RETAINING SUFFICIENT PCPS AND NURSES AT HDSP IN A NUMBER SUFFICIENT TO ACCOMMODATE MEDICAL NEEDS OF A SWELLING POPULATION OF 4000 PRISONERS AND IN PROPERLY SUPERVISING AND AUDITING HDSP'S MEDICAL OPERATIONS TO ENSURE IT OPERATED WITHIN CONSTITUTIONAL NORMS AND MINIMUM STANDARDS. HIS DERELICTION IN DOING SO TACITLY FOSTERED THE CURRENT ENVIRONMENT AND CLIMATE NOW PREVALENT AT HDSP, SET IN MOTION AND IS THE PROXIMATE CAUSE AND MOVING FORCE BEHIND MS. DIXON'S CONSTITUTIONAL VIOLATIONS. THROUGH VARIOUS GRIEVANCES AND SUITS MINEV BECAME KNOWLEDGEABLE OF THE DEPLORABLE LEVELS OF MEDICAL INDIFFERENCES AND ABUSES AT HDSP FAR PRIOR TO MS. DIXON'S NOVEMBER 05, 2021 ARRIVAL AND TACITLY SANCTIONED AND RATIFIED THEM BY FAILING TO CORRECT THEM AND IN EFFECT ACQUIESCING IN THE ABUSES OF HIS SUBORDINATES WITH COMPLETE INDIFFERENCE TO THE HEALTH, LIVES AND SUFFERINGS OF HDSP RESIDENTS, INCLUDING MS. DIXON.

29. LIKEWISE, DEFENDANT JOHNSON AS HDSP'S WARDEN WAS RESPONSIBLE FOR THE HIRING AND RETAINING SUFFICIENT MEDICAL STAFF AT HDSP IN A MANNER TO CARE FOR THE POPULATION OF INMATES UNDER HIS CHARGE INCLUDING MS. DIXON. HE WAS RESPONSIBLE FOR THE WELFARE AND HEALTH OF INMATES UNDER HIS CHARGE AND FOR ENSURING ALL 4000 PRISONERS UNDER HIS CHARGE RECEIVED ADEQUATE, TIMELY, EFFECTIVE, OBJECTIVE AND CONSTITUTIONALLY ACCEPTABLE CARE AND TREATMENT. THROUGH VARIOUS GRIEVANCES, SUITS AND INMATE DEATHS HE BECAME KNOWLEDGEABLE OF HDSP'S DEPLORABLE MEDICAL CRISIS AND ITS DIRECT LINK TO THE DEATHS AND SUFFERINGS OF INMATES UNDER HIS CHARGE FAR PRIOR TO MS. DIXON'S ARRIVAL. HE TOO TACITLY SANCTIONED AND RATIFIED THEM BY FAILING TO EXPOSE, CON-

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FRONT, CORRECT AND/OR REPORT THEM TO MINEV FOR ACTION AND THROUGH  
CONCEALMENT IN EFFECT ACCOMPLISHING THROUGH INACTION IN THE MANY  
ABUSES OF HIS SUBORDINATES WITH COMPLETE INSENSITIVITY AND IN-  
DIFFERENCE TO THE HEALTH, LIVES AND SUFFERINGS OF HDSP RESIDENTS IN-  
CLUDING MS. DIXON. IN ALL RESPECTS JOHNSON SIMPLY STUCK HIS HEAD  
IN THE SAND.

30. AT HDSP MS. DIXON WAS ADMITTED TO THE INFIRMARY BY ORDER  
OF DR. RIVAS. ITS CONDITIONS WERE FUNCTIONAL EQUIVALENT OF SEGRE-  
GATIONS HARSHEST. SHE REMAINED UNTIL HER NOVEMBER 10, 2021 IN-  
SISTED DISCHARGE GIVEN ITS PUNITIVE CONDITIONS.

31. AFTER ADMIT, HOWEVER, AND COGNIZANT THAT HER TRANSFER WAS TO  
PROVIDE A "HIGHER" LOC, DR. RIVAS RESUMED ALL CHRONIC MEDICATIONS  
ADDING PLAVIX AND REORDERING PROPRANOLOL AGAINST CARDIOLOGY  
ORDERS AND DESPITE LACKING MEDICAL EDUCATION OR QUALIFICATION  
TO REFUTE THE CARDIOLOGY DETERMINATION.

32. UNBEKNOWN TO MS. DIXON, WAS PROPRANOLOL AS ORDERED BY DR. RIVAS,  
ABSENT CARDIOLOGY APPROVAL, ACTED TO ONLY EXACERBATE HER HEART /  
CHEST PAINS AND BREATHING DIFFICULTIES. DR. RIVAS ARBITRARILY  
REDUCED HER URGENCY LOC FROM 1 OF 5 TO 3 OF 5 (IE., FROM UR-  
GENT/CRITICAL TO MODERATE) AND ABSENT CONSULTING HER ARBITRAR-  
ILY DISCONTINUED HER BACLOFEN RESTORING HER TO AGONIZING NECK  
AND BACK PAINS OTHERWISE TOLERABLE WITH THE MEDICATION AND  
WITH PROVISION OF NO ALTERNATIVE.

33. UNLICENSED AND EMPLOYED BY FRAUDULENT MEANS, SHE SAW DR.  
BERNALES NOVEMBER 09, 2021. AGAINST CARDIOLOGY ORDERS HE TOO  
CONTINUED PROPRANOLOL. HE ALSO ORDERED LABS "ASAP" AND CHECKING  
OF ELECTROLYTES. A EKG WAS CONDUCTED AND ITS ABNORMAL RESULTS

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GIVEN TO DR. RIVAS WHO ON NOVEMBER 10, 2021 CONSULTED WITH AND  
PURSUANT TO HER INSISTENCE DISCHARGED HER. LABS RETURNED NOVEMBER  
11, 2021 REPORTING 6 ABNORMAL FLAGS. WHILE IN THE INFIRmary HER  
COMPLAINTS OF HEART/ CHEST PAINS AND BREATHING DIFFICULTIES CONTINUED  
BUT FOR DR. RIVAS AND BERNALes'S DOCTORING OF MEDICAL RECORDS WHICH  
WAS TYPICAL OF THESE 2 ROGUE PCPs.

34. ON NOVEMBER 14, 2021 MS. DIXON GRIEVED INSISTING ON POST-HEPC  
PROTOCOL MONITORING AND TESTING, ENDOCRINOLOGY ACCESS AND COMPLAIN-  
ING OF HER LITANY OF AILMENTS SEEKING RESPONSIVE TREATMENTS. MEDICAL  
DEFENDANTS IGNORED HER AND TODEATE, 8 MONTHS LATER, SHE HAS  
RECEIVED ABSOLUTELY NO REPLY.

35. DUE TO LAGGING CARDIOLOGY CONSULT FOLLOWING HER EMERGENCY TRANS-  
FER, ON DECEMBER 02, 2021 SHE INSTITUTED DIXON V. MINEV, USDC  
(D. NEV.) NO. 2:21-cv-02133 APG VCF SEEKING EMERGENCY INJUNCTIVE  
RELIEF. SOLELY BY VIRTUE OF THIS CASE WAS HER CARDIOLOGY CONSULT  
EXPEDITED. OTHERWISE, SHE MAY STILL BE AWAITING TODEATE. THIS ACT-  
ION SERVED AS MEDICAL DEFENDANTS FIRST IMPETUS FOR RETALIATION  
AND WAS ACTUALLY PLACED INTO HER MEDICAL RECORD FOR ALL TO  
SEE.

36. ON AND ABOUT DECEMBER 06, 2021 DEFENDANTS GUTIERREZ, GOBLER, RIVAS  
AND BERNALes RECEIVED A EMAIL FROM DAG AUSTIN T. BARNUM NOTIFYING  
THEM OF MS. DIXON'S SUIT AND MOTION FOR INJUNCTIVE RELIEF AS NOTED  
BY BERNALes. IT WAS PLACED INTO HER MEDICAL RECORD. ONLY AFTER  
DID BERNALes VIEW HER LABS. DESPITE LANGUAGE ASSOCIATED WITH  
HER EMERGENCY TRANSFER OF "IMMEDIATE", "ASAP", "URGENT" AND "STAT"  
PLACING EMPHASIS ON THE EMERGENT NATURE OF HER CARDIOLOGY CONSULT  
FOLLOWING HER HDSP ARRIVAL, BERNALes NOTED HER DESIRE TO SEE

GIVING MORE WEIGHT TO HIS "ASAP" THAN THAT OF A CARDIOLOGY SPECIALIST.

37. ON DECEMBER 23, 2021 SHE WAS CONSULTED WITH A CARDIOLOGIST AND A EKG PERFORMED RESULTED IN ABNORMAL FINDINGS, SPECIFICALLY:

"SINUS BRADYCARDIA WITH FREQUENT VENTRICULAR PREMATURE COMPLEXES LATERAL MYOCARDIAL INFARCTION, PROBABLY RECENT. \*\*\* ACUTE MI \*\*\*!"

CERTAINLY THESE READINGS ARE INDICATIVE OF MS. DIXON'S "HYPOCONDRIACT" TITLE MEDICAL DEFENDANTS WOULD LATER AWARD HER.

38. REALIZING FATAL PROSPECTS OF PROPRANOLOL PRESCRIBED THE CARDIOLOGIST AGAIN IMMEDIATELY DISCONTINUED IT PLACING HER ON METOPROLOL 25 MG AND ORDERED STRESS, TREADMILL AND TABLE TILT TESTS, "STAT." DESPITE A SECOND CARDIOLOGIST DISCONTINUING PROPRANOLOL AND PRESCRIBING METOPROLOL IMMEDIATELY UPON HER FIRST CONSULT TO ASSURE HER HEALTH, GUTIERREZ, GOBLER, BERNALES, RIVAS AND CERTAIN DOES CONTINUED TO ADMINISTER THE POTENTIALLY FATAL MEDICATION AND ENCOURAGE ITS USE OVER CARDIOLOGY INSTRUCTION.

39. ORDERED DECEMBER 23, 2021, PHARMACEUTICAL AND MEDICAL DOES AND GOBLER, RIVAS AND BERNALES FAILED TO PROVIDE THE HEART MEDICATION FOR ANOTHER 22 DAYS AND UNTIL JANUARY 14, 2022 WHILE MS. DIXON SUFFERED, DETERIORATED AND HER SYMPTOMS AND COMPLAINTS PERSISTED.

40. MEDICAL DEFENDANTS INEPTITUDE AND LACK OF ORDER WAS SO DYSFUNCTIONAL SO AS TO SYSTEMICALLY IMPEDE AND INTERFERE WITH MS. DIXON'S LIFE SUSTAINING MEDICATION AND TREATMENT ORDERED BY THEIR OWN CARDIOLOGIST. MEDICAL AND PHARMACEUTICAL DOES PURPOSEFULLY, SYSTEMICALLY AND PURSUANT TO A DEEPLY ROOTED AND ENTRENCHED CUSTOM,

PRACTICE AND POLICY, ACTED AND/OR FAILED TO ACT, AND KNOWINGLY PERMITTED AND ACQUIESCED IN UNREASONABLE PROTRACTED DELAYS IN PROVIDING HER HEART MEDICATIONS, EXPOSING AND SUBJECTING HER TO WANTONLY IMMENSE SUFFERING, HEART ATTACK, STROKE AND A LOOMING DEATH WITH COMPLETE INDIFFERENCE TO HER HEALTH, SAFETY AND LIFE.

41. SHOCKINGLY, TO COMPENSATE FOR THEIR EGREGIOUS DYSFUNCTION, INCOMPETENCE, INEPTITUDE AND UNREASONABLE DELAYS, GUTIERREZ, GOBLER, RIVAS AND OTHER PHARMACEUTICAL AND MEDICAL DOES BETWEEN DECEMBER 23, 2021 AND JANUARY 14, 2022 ENCOURAGED HER TO CONTINUE PROPRANOLOL CONTRARY TO CARDIOLOGY ORDERS AND UNTIL METOPROLOL ARRIVED FROM THEIR SNAIL-PACED OFF-SITE PHARMACY. BERNALES MADE A CHART ENTRY DECEMBER 27, 2021 TO "STOP PROPRANOLOL NOW!!" NOTWITHSTANDING, RIVAS, GUTIERREZ, GOBLER AND DOES CONTINUED TO DISPENSE SUCH. WHEN HER HEART MEDICATIONS WEREN'T PROVIDED BY JANUARY 04, 2022, SHE GRIEVED. THE FOLLOWING DAY JANUARY 05, 2022 GOBLER REPLIED ADVISING HER "PER PHYSICIAN" TO CONTINUE PROPRANOLOL UNTIL METOPROLOL ARRIVED.

42. MS. DIXON FILED A EMERGENCY GRIEVANCE ON JANUARY 19, 2022 COMPLAINING OF HER CONTINUING SUFFERINGS AND AGONY. IN VIOLATION OF HER HIPAA PROTECTIONS HER MEDICAL CONDITIONS WERE MADE PRIVY TO A NON-MEDICAL INDIVIDUAL LIEUTENANT WHO RESPONDED JANUARY 19, 2022. HER DETERIORATING HEALTH TRIGGERED A EMERGENCY MEDICAL SUMMON JANUARY 26, 2022. A EKG WAS CONDUCTED WITH ABNORMAL FINDINGS. SHE DECLINED 23 HOUR OBSERVATION DUE TO THE PUNITIVE NATURE OF INFIRMARY HOUSING WHEN COMPARED TO REGULAR POPULATION

43. BY JANUARY 31, 2022 SHE DEPLETED HER METOPROLOL AND SOUGHT A REFILL. ON FEBRUARY 08, 2022 HER ECHOCARDIOGRAM WAS CONDUCTED. BY FEBRUARY 14, 2022, SOME 2 WEEKS AGAIN WITHOUT HER HEART MEDICINE, SHE GRIEVED ON EMERGENCY BASIS. GOBLER RESPONDED 2 DAYS LATER AD-  
VISING: "NOT AN EMERGENCY. WAITING FOR PHARM TO DELIVER IN THE <sup>ST.</sup> NEXT FEW DAYS." ON FEBRUARY 20, 2022 SOME 20+ DAYS AFTER DEPLETING HER ISSUANCE OF METOPROLOL, SHE WAS PROVIDED A REFILL.

44. ON FEBRUARY 22, 2022, A DOE NURSE NOTIFIED MS. DIXON OF THE SCHEDULED TABLE-TILT TEST. UNQUALIFIED TO DO SO, THIS DOE PROVIDED HER PRE-PROCEDURE INSTRUCTIONS ASSURING HER SHE COULD CONSUME HER HEART MEDICINE PRIOR TO THE PROCEDURE. CONTRARY, REALIZING SHE HAD DONE SO, HER NEEDED PROCEDURE WAS CANCELLED, DELAYED AND SUBJECT TO DOES RESCHEDULING. IT WAS RESCHEDULED AND CONDUCTED MARCH 14, 2022 RESULTING IN ABNORMAL FINDINGS. THE CARDIOLOGIST NARROWED POTENTIAL NEUROLOGICAL ETIOLOGIES FOR HER LITANY OF SYMPTOMS. SUSPECTING HER FAINTING SPELLS TO BE SECONDARY TO A NEUROLOGICAL CUL-  
PIT, THE CARDIOLOGIST ORDERED HER REFERRAL TO NEUROLOGY. THE UNNECESSARY DELAY FROM FEBRUARY 22ND THRU MARCH 14TH, 2022, CAUSED PLAINTIFF ADDITIONAL GRIEF, DISTRESS AND SUFFERING.

45. 3 DAYS AFTER HER TILT TEST AND ON MARCH 17, 2022, SHE EXPERIENCED TERRIFYING AND EXCRUCIATING INTENSE HEART AND CHEST PAINS, A COMPLETE INABILITY TO BREATH AND SEVERE FAINT SENSATIONS. WITH ASSISTANCE OF INMATE WHITE AT 11:30 A.M. AN EMERGENCY MEDICAL SUMMON WAS REPORTED TO DEFENDANT ZABEL WHO CONTACTED MEDICAL. BY 12:24 WHEN NO MEDIC ARRIVED, MR. WHITE ASKED THE INMATE UNIT  
S. SEE FN 3, SUPRA.

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WORKER TO INQUIRE. DEFENDANT RAYFORD IN THE UNIT TOWER AT THE  
TIME SIMPLY REPLIED "BE PATIENT." AN EMERGENCY GRIEVANCE FORM WAS  
SOUGHT FROM RAYFORD AND WAS DENIED. ON CAMERA AT APPROXIMATELY  
1236 HOURS (SOME 1 HOUR AND 9 MINUTES LATER), DEFENDANT JUSTIN  
ARRIVED TO MS. DIXON'S UNIT PARTAKING IN FURTHER DELAY BY BANTERING  
WITH DEFENDANTS ZABEL, JARRETT AND OFFICER GONZALES RATHER THAN  
RESPONDING TO HER EMERGENCY. AT APPROXIMATELY 1239 HOURS  
RAYFORD RELEASED MS. DIXON FROM HER QUARTERS.

46. OPPOSED TO RESPONDING TO HER EMERGENCY LOCATION, MS. DIXON WAS  
MADE TO WALK 300 FT TO JUSTIN DESPITE HER DISTRESS. TERRIFIED AND  
FRUSTRATED AT THE EGREGIOUS DELAY IN RESPONSE AND EXPERIENCE, UNDER-  
STANDABLY SHE BERATED JUSTIN'S TARDY RESPONSE VOWING TO GRIEVE  
HIM. INSTANTANEOUSLY, ON CAMERA IN PRESENCE OF RAYFORD, ZABEL,  
JARRETT AND OFFICER GONZALES, WITHOUT ANY ASSESSMENT WHATSOEVER,  
JUSTIN STATED "THEN YOU'RE REFUSING TREATMENT" AND ABANDONED  
HER IN DISTRESS REFUSING HER CARE. THE EGREGIOUSLY TARDY RESPONSE  
OF 1 HOUR AND 9 MINUTES WAS OUT OF RESENTMENT TO CAUSE HER SUF-  
FERING AND ON ACCOUNT OF MEDICAL DEFENDANTS VIEWING HER AS A  
NUISANCE GIVEN HER MANY MKSR'S, GRIEVANCES AND DIXON V. MINEV,  
SUPRA.

47. RESULTING REPORTS OF JUSTIN AS TYPICAL, WERE DOCTORED AND FALSI-  
FIED. OBSERVING THE BLATANT REFUSAL OF CARE AND HER SUFFERING, RAYFORD,  
JARRETT AND ZABEL HAD A DUTY TO REPORT THIS EGREGIOUS ABUSE TO JOHNSON,  
GOBLER, GUTIERREZ, ONTIVEROS AND OTHER DOE SUPERVISORS (AR 339,  
RESPONSIBILITY; 339.01 1.A.(7); 740.03 2) AND SECURE MS. DIXON'S  
CARE TO PREVENT HER SUFFERINGS. DESPITE HAVING OPPORTUNITY AND  
AUTHORITY TO DO SO, THEY EACH CONSCIOUSLY REFUSED, TACITLY APPROV-

ING OF, RATIFYING AND ACQUIESCING IN HER ABUSE AND SUFFERING BY CONCEALING THE ABUSE AND BEING COMPLICIT IN HER UNCONSTITUTIONAL DENIAL OF MEDICAL CARE.

48. AT 1:49 P.M. SHE SUBMITTED A 2-PAGE EMERGENCY GRIEVANCE RECEIVED, ACCEPTED AND SIGNED BY JACKSON. IT ARTICULATED THE EVENTS. SHE SOUGHT ASSESSMENT, TREATMENT, THE NAME OF JUSTIN FOR LEGAL PURPOSES, THAT MEDICAL REPORTS NOT BE FALSIFIED PURSUANT TO MEDICAL DEFENDANTS CUSTOMS AND SPECIFICALLY THAT VIDEO FOOTAGE BE PRESERVED OF THE EVENT FOR LEGAL PURPOSES. 30 MINUTES LATER AT 2:19 P.M. IN VIOLATION OF AR 740.3 2. B. AND 740.07 2, IN ADDITION TO ALTERING A LEGAL DOCUMENT BY DISPOSING OF PAGE 2 OF THE DOCUMENT, JUSTIN RESPONDED: "YOU DID NOT EXHIBIT S/S (SIGNS/SYMPOTMS) OF CARDIAC/PULMONARY ISSUES AT TIME OF MANDOWN. PER AR 740, THIS IS NOT AN EMERGENCY GRIEVANCE.

(1/2) - PER AR 740, NO MORE THAN THE ABOVE AREA CAN BE FILLED." TAUNTING HER IN HIS DEPARTING STATEMENT JUSTIN STATED "GOD BLESS YOU!" IF HISTORY REPEATS ITSELF, CONVENIENTLY CAMERAS AT SAID TIME WILL HAVE BEEN "INOPERABLE" AND ZABEL AND JARRETT WILL COINCIDENTLY "MISREMEMBER" THESE EVENTS AND ABUSES WHEN CALLED UPON FOR RECOLLECTION.

49. ON CAMERA AT APPROXIMATELY 9:07 A.M. ON MARCH 25, 2022 SHE REPORTED TO A.M. PILL LINE COMPLAINING TO THE DOE MALE NURSE OF INTERNAL BLEEDING AND EXPELLING OF BLOOD IN THE PRESENCE OF JARRETT. SHE WAS REBUFFED SUBSEQUENTLY SUBMITTING ANOTHER EMERGENCY GRIEVANCE COMPLAINING OF HER LITANY OF MKSPS, WANTON PAIN AND SUFFERING, INTERNAL BLEEDING, ANAL PAINS AND PASSING OUT FAINTING SPELLS. IT WAS RECEIVED, ACCEPTED AND SIGNED BY JARRETT. AT 4:50 P.M. JUSTIN RE-

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SPONDED TO THAT GRIEVANCE: "PER AP 740, PLEASE FOLLOW PROPER CHANNELS. REPRIMAND TO FOLLOW."

SO. AT 1:10 P.M. ON MARCH 27, 2022 SHE AGAIN FILED A EMERGENCY GRIEVANCE RECEIVED, ACCEPTED AND SIGNED BY LOPEZ-MAYA. THERE HER COMPLAINTS PERSISTED AND CONCLUDED SHE WAS "... BEING MADE TO SUFFER AND MY AILMENTS ARE GETTING WORSE. I NEED TO SEE DR. ASAP - NOT BE REPRIMANDED!" A UNIDENTIFIED MEDICAL DOE RESPONDED: "NOT AN EMERGENCY PER AP 740 - THIS IS A DUPLICATE. SEVERAL SUBMITTED - YOU ARE CONTINUING TO DUPLICATE - SUBMIT WHICH IS GROUNDS FOR REPRIMAND."

SI. ON MARCH 28, 2022 SHE RETURNED TO CARDIOLOGY WHERE HER METOPROLOL WAS INCREASED TO 50 MG AND YET ANOTHER NEUROLOGY ORDER WAS ENTERED. ON MARCH 30, 2022, SHE SUBMITTED YET ANOTHER EMERGENCY GRIEVANCE RECEIVED, ACCEPTED AND SIGNED BY JARRETT. THERE SHE COMPLAINED "NEED TO SEE DR. PLEASE - CONTINUE TO COMPLAIN OF BLOOD IN STOOL, BREATHING ISSUES, SORE THROAT, FAINTING SPELLS, NECK PAINS, ETC. FEAR THIS COULD BE A POSSIBLE CANCER. HAVE SUBMITTED SEVERAL MEDICAL KITES AND AM BEING THREATENED WITH REPRIMANDS FOR CONTINUING TO BRING MY CONCERN TO MEDICALS ATTENTION ONLY TO BE MET WITH RESISTANCE AND NEGLECT. PLEASE HELP ME!! SUFFERING / PAIN!!" JUSTIN RESPONDED: "APPOINTMENT MADE."

SZ. SHORTLY PRIOR TO 5:30 P.M. ON MARCH 31, 2022, ONTIVEROS DIRECTED SALKOFF, ASHCRAFT, OBLAK, JACKSON, MARTINEZ, LOPEZ-MAYA AND OTHER DOES TO SEARCH MS. DIXON'S CELL BASED ON CONFIDENTIAL INFORMATION PURPORTEDLY FROM A INMATE JOSHUA JOHNSON NO. 1251687. IN CONJUNCTION WITH DOING SO AND ON CAMERA ASHCRAFT INCITED A VIOLENT CONFRONTATION BETWEEN PLAINTIFF, MR. WHITE AND INMATE JOHNSON.

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53. AS A RESULT OF THE SEARCH AND INCIDENT, AN ABUNDANCE OF HER AND  
MR. WHITE'S PROPERTIES WERE SEIZED BY THESE DEFENDANTS WHILE  
SHE AND WHITE WERE DETAINED AND SEGREGATED. AMONGST THIS PROPERTY  
HANDLED, CONTROLLED AND TAKEN BY THESE DEFENDANTS WERE HER KOP  
LIFE-SUSTAINING AND OTHER MEDICINES AND HER RIGHT HAND  
APPARATUS.

54. PRIOR TO, CONTEMPORANEOUS WITH AND SUBSEQUENT TO HER SEGREGATION,  
SHE SOUGHT HER MEDICATIONS AND APPARATUS FROM MEDICAL DEFENDANTS  
AND DEFENDANTS SALKOFF, ASHCRAFT, OBLAK, MARTINEZ, LOPEZ-MAYA,  
JACKSON, BARRETT, STEWART, GARCIA, VALLE AND CERTAIN DOES, TO NO  
AVAIL AS THESE DEFENDANTS REBUFFED HER PLEAS DESPITE BEING  
ON NOTICE OF INTERRUPTION OF HER CARE, WANTON SUFFERING SHE  
ENDURED AND WOULD CONTINUE TO ENDURE ABSENT ASSISTANCE. EACH  
WERE INDIFFERENT TO SUCH. HAVING KNOWLEDGE OF THESE CIRCUM-  
STANCES, OPPORTUNITY AND AUTHORITY TO RECTIFY THE VIOLATION,  
EACH SADISTICALLY CHOSE NOT TO OUT OF PESENTMENT AND SPIRE FOR  
HER AND MR. WHITE'S REVELATIONS OF THESE DEFENDANTS COLLEGE  
OFFICER FAIR ROSE LOUVERTURE (SINCE FIRED) AND DEFENDANT  
ASHCRAFT OPENLY INCITING AND INSTIGATING THE VIOLENT  
CONFRONTATION WITH INMATE JOHNSON.

55. ON APRIL 05, 2022 ON THEIR BEHALF, MR. WHITE IN PERSON INFORMED  
VALLE AND GARCIA OF THE IMPERATIVE NEED OF HIM AND MS. DIXON  
TO OBTAIN ESSENTIAL MEDICINES AND APPARATUS'S OUT OF THEIR  
PROPERTIES IN POSSESSION OF VALLE AND GARCIA. HE EMPHASIZED  
THAT THEY WERE LIFE-SUSTAINING MEDICATIONS AND THAT BOTH HE  
AND MS. DIXON WERE SUFFERING WITHOUT THEM. GARCIA ADVISED  
THAT MS. DIXON AND MR. WHITE WOULD GET IT WHEN HE (GARCIA)

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"GETS AROUND TO IT" AND IF THEY KEPT COMPLAINING HE WOULD TAKE  
MOST OF THEIR PROPERTY. THE COMPLAINTS CONTINUED DUE TO SUFFERINGS  
AND VALLE AND GARCIA DELIVERED ON THE THREATS PILAGING HER  
PROPERTY. WHEN IT WAS DELIVERED SHE DISCOVERED HER MEDICINES  
AND APPARATUS WERE CAPRICIOUSLY AND MALICIOUSLY DISCARDED BY  
VALLE AND GARCIA PURPOSEFULLY INTERRUPTING AND SABOTAGING HER  
CARE OUT OF SPITE. SHE WAS MADE TO PREVENTABLY SUFFER FROM  
MARCH 31, 2022 UNTIL SHE WAS ABLE TO OBTAIN A REFILL FROM  
MEDICAL DEFENDANTS. HER RIGHT HAND APPARATUS HAS STILL NOT BEEN  
RETURNED TODATE.

56. ON APRIL 26, 2022 SHE UNDERWENT THE FINAL "STAT" CARDIOLOGY  
ORDERED TEST ORDERED DECEMBER 23, 2021 (4 MONTHS EARLIER) WHICH  
ENCOMPASSED AN EXERTING AND STRENuous CARDIOLITE TREADMILL TEST.  
SHE EXHAUSTIVELY COOPERATED. POST-PROCEDURE DEPARTING WARNING  
OF CARDIOLOGY STAFF EDUCATED HER OF TYPICAL POST-PROCEDURE COM-  
PLICATIONS ADVISING HER THAT SHOULD SHE ENCOUNTER ANY TO  
"IMMEDIATELY" ALERT MEDICAL STAFF AS THEY COULD BE LIFE-  
THREATENING. FOLLOWING HER OFF-SITE RETURN TO THE PRISON AND HER  
HOUSING UNIT 6-B, AS ALERTED, SHE ENCOUNTERED TERRIFYING COM-  
PLICATIONS OF BREATHING, FAINT SPELLS, CHEST AND HEART PAINS,  
FEVER AND HIGH BLOOD PRESSURE. SHE "IMMEDIATELY" CONTACTED UNIT  
6-B OFFICERS RONOS, GISTEN AND EMIL SEEKING EMERGENCY MEDICAL  
ATTENTION FOR ASSESSMENT AND TREATMENT OF HER POST-PROCEDURE  
COMPLICATIONS.

57. RONOS, EMIL AND GISTEN REBUFFED HER REFUSING TO CONTACT MEDE-  
ICAL STAFF FOR EMERGENCY RESPONSE AND COMMENTING ON THE MARCH  
31, 2022 STABBING INCIDENT AND HER EXPOSURE OF ASHCRAFT AND

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NOW FIRED OFFICER LOUVERTURE FOR INSTIGATING THAT INCIDENT. SHE  
WAS ADVISED UNLESS SHE "... WAS FLOPPING AROUND ON THE FLOOR" THEY  
WOULD NOT CALL MEDICAL. AS SHE WAS VISIBLELY SHAKEN, TERRIFIED  
AND EXHIBITING CLEAR SYMPTOMS OF DISTRESS, 6ISTEN AND EMIL  
CALLOUSLY AND INSENSITIVELY LAUGHED AT, TAUNTED AND DIRECTED  
EPITHETS AT HER SHOWING ABSOLUTELY NO EMPATHY, CONCERN OR  
COMPASSION ACTING WITH COMPLETE INSENSITIVITY TO HER DIRE  
STATE OF SUFFERING AND SHEER TERROR.

58. AFTER SHIFT CHANGE SHE WAS FORTUITOUS TO ACCESS MEDICAL  
STAFF. IT WAS DISCOVERED HER SYMPTOMS WERE SECONDARY TO  
HBP CONTRIBUTING TO SPEEDY HEART RATE, FAINT SPELLS, LABORED  
BREATHING AND HIGH FEVER. ALTHOUGH INCREASED MARCH 28, 2022  
TO 50 MG, BY APRIL 28, 2022 (1 MONTH LATER) SHE STILL HAD NOT  
RECEIVED HER LIFE-SUSTAINING MEDICATION METOPROLOL DUE TO  
PHARMACY DOES CUSTOMS AND PRACTICES.

59. BY MAY 21, 2022 DUE TO RAPID HEALTH DETERIORATION AND SUFFERING,  
PREDICTING TRAGIC RESULTS, SHE FILED A EMERGENCY GRIEVANCE CONTIN-  
UING THE SUBSTANCE OF HER COMPLAINTS. HER DEPARTING STATEMENT EM-  
PHASIZED: "I AM DETERIORATING AND SUFFERING!" SHE WAS AD-  
VISED SHE'D SEE A PCP MAY 24, 2022 WHICH REVEALED TO BE A  
HOLLOW PROMISE AS IT WAS PURPORTEDLY CANCELLED DUE TO "LACK OF  
PROVIDERS" WHICH BROUGHT HER NO COMFORT.<sup>61</sup>

60. AFTER MONTHS OF COMPLAINTS, MKSPS, SUFFERING, TERROR, AGONIZING  
PAIN AND BEING INFORMED "... NOT AN EMERGENCY, ... BE PATIENT, ...  
PLACED ON PROVIDERS LIST, ... LIST IS LONG, ... YOU'LL BE NOTIFIED  
THE DATE OF YOUR APPOINTMENT," AGAIN PURPORTEDLY SHE WAS SLATED  
TO SEE A PCP MAY 24, 2022 WHERE IT TOO WAS CANCELLED. DUE TO

6. "LACK OF PROVIDERS" HAS OBVIOUSLY REMAINED THE COMMON NUCLEUS OF  
HER 8 MONTH PLIGHT AND PROTRACTED DELAYS IN HER CARE AND TREAT-  
MENT. SUCH BEING THE CASE IT IS QUESTIONABLE AS TO HOW MEDICAL  
DEFENDANTS REGARD THIS AS A HIGHER LOC WHEN NO PCPS EXIST  
TO PROVIDE ANY CARE - LESS ALONE A HIGHER LOC FOR THAT  
MATTER.

HER PERSISTENT FAINT SPELLS BY MAY 28, 2022 SHE INJURED HER

RIGHT HAND SURGERY SITE AS WELL AS HER LEFT HAND. UNBEKNOWN TO HER AT THE TIME, MATTERS WOULD BE GETTING WORSE SHORTLY.

61. AS LONG PREDICTED AND FEARED, ON MAY 29, 2022 THE UNTHINKABLE MANIFESTED JUST 5 DAYS AFTER BEING CANCELLED PCP ACCESS. AFTER LOSING CONSCIOUSNESS AND STRIKING HER HEAD ON A SHARP CELL LEDGE, SHE WAS DISCOVERED NON-RESPONSIVE IN A POOL OF BLOOD COPIOUSLY BLEEDING OUT BY STAFF. SHE WAS USHERED TO A CLINICAL SETTING, REVIVED, STABALIZED AND RECEIVED SUTURES TO CLOSE THE GRUESOME SCALP GASH BEFORE BEING RETURNED TO HER CELL WITH NO PCP EVALUATION, CT SCAN OR MONITORING IN LIGHT OF THE FORCEFUL HEAD INJURY.

TERRIFIED FOR HER LIFE, ON MAY 30, 2022 SHE CORRESPONDED WITH DEFENDANTS JOHNSON, MINEV, GUTIERREZ AND GOBLER BEGGING FOR THEIR ASSISTANCE TO NO AVAIL. SHE ALSO NOTIFIED OTHER MEDICAL DEFENDANTS FILING COUNTLESS GRIEVANCES, REQUESTS AND MKSRIS CONTINUING HER COMPLAINTS AND PLEADING FOR ASSISTANCE. SHE RECEIVED NO RESPONSE OR ASSISTANCE.

62. ON JUNE 02, 2022 SHE FILED ANOTHER EMERGENCY GRIEVANCE COMPLAINING OF INTERNAL BLEEDING, BREATHING ISSUES, BLACK OUT SPELLS, PAINS, ETC. SHE SOUGHT NEUROLOGY CONSULT AND CONTACT WITH A PCP. JUSTIN DISMISSED HER CONCERN'S RESPONDING: "PER AR 740, NOT AN EMERGENCY GRIEVANCE." ON JUNE 05, 2022 HER METOPROLOL AT 50MG AS ORDERED BY CARDIOLOGY WAS FINALLY INCREASED AND SHE WAS ADVISED SHE'D BE IMMEDIATELY PROVIDED A "FLOOR STOCK" DUE TO LACKING HER LIFE-SUSTAINING MEDICINE FOR LONG DURATION. BY JUNE 07, 2022 WHEN SHE HADN'T RECEIVED IT SHE FILED YET ANOTHER EMERGENCY GRIEVANCE CONTINUING HER COMPLAINTS. ANOTHER EMER-

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EMERGENCY GRIEVANCE FILED JUNE 12, 2022 COMPLAINT OF INTERNAL BLEEDING -  
TURGID AND BLOOD IN STOOL. A DOE RESPONDED JUNE 14, 2022 "PLACED  
ON PROVIDER SICK CALL LIST TO BE SEEN!"

63. BY MEDICAL DEFENDANTS ACCOUNT SHE WAS AGAIN SCHEDULED TO SEE  
A PCP JUNE 15, 2022 SOME 22 DAYS AFTER HER PURPORTED MAY 24, 2022  
CANCELLATION AND 17 DAYS AFTER INCURRING THE SERIOUS MAY 29, 2022  
HEAD INJURIES. THE PCP CONTACT WAS TO ADDRESS INTERNAL BLEEDING,  
HEREDITARY CANCER, BREATHING ISSUES, WEIGHT LOSS AND RIGHT HAND  
WRIST STABALIZATION. NOT SURPRISINGLY, THE PROMISE WAS AGAIN  
HOLLOW AS WELL AND SHE WAS PURPORTEDLY CANCELLED PROMPTING AN  
EMERGENCY GRIEVANCE. IT WAS RESPONDED TO JUNE 16, 2022 BY A NON-  
MEDICAL OFFICIAL VIOLATIVE OF HER HIPAA PROTECTIONS AND OFFERED  
YET ANOTHER HOLLOW PROMISE THAT SHE WAS AGAIN SCHEDULED TO SEE  
A PCP AND "THIS IS NOT A EMERGENCY AS DEFINED BY AR 740."

64. SHE HAD A RECURRENT OF HORRIFYING SYMPTOMS THE MORNING OF  
JUNE 26, 2022 AT 0755 HOURS INCLUDING BULGING EYES, VOMITING, INTEN-  
SE CHEST/HEART PAINS, DIZZINESS AND BREATHING COMPLICATIONS  
AS WITNESSED BY A OFFICER WHO SUMMONED EMERGENT MEDIES. A  
DOE NURSE RESPONDED AT 0815 HOURS, TOOK MS. DIXON'S VITALS TO  
DISCOVER HBP AND ACCELERATING HEART BEATS. SHE WAS PLACED BACK  
INTO HER CELL AND REFUSED TREATMENT AND WAS NOT TAKEN TO A CLINIC  
SETTING FOR MONITORING. IN CELL, SHE WAS MADE TO SUFFER THE  
TERRIFYING ORDEAL FOR 5 1/2 HOURS UNTIL 1:30 P.M. WITHOUT  
MEDICAL INTERVENTION.

65. WHEN HER SYMPTOMS WOULD NOT SUBSIDE, AT 1:30 P.M. SHE WAS  
USHERED TO THE CLINIC WHERE A EKG WAS PERFORMED WITH ABNOR-  
MAL FINDINGS. SHE WAS RETURNED TO HER CELL WITH NO ACCESS TO

A PCP AND ADVISED A PCP WOULD VIEW HER EKG RESULTS. SHE AGAIN SUBMITTED A GRIEVANCE AND KITES TO GUTIERREZ AND GOBLER PLEADING FOR HELP AND RECEIVED NO RESPONSE. BY JUNE 29, 2022 WITH STILL NO PCP ACCESS SHE SOUGHT THAT CUSTODY STAFF INQUIRE INTO HER PCP APPOINTMENT SOME 34 DAYS AFTER HER MAY 24, 2022 CANCELLATION IN WHICH SHE WAS ASSURED SHE'D BE RESCHEDULED PRIORITY AT "NEXT" SCHEDULED PCP LINE. A DOE NURSE ADVISED INQUIRING CUSTODY STAFF THAT SHE WOULD NOT SEE A PCP THAT HER ONLY PROBLEM WAS THAT SHE WAS A "HYPOCONDRIAC". GIVEN CUSTODY STAFF PERSONALLY WITNESSING HER MEDICAL PLIGHT AND DEGREE OF SUFFERING, UPON RECEIVING THIS ABSURD CONTENTION IT WAS DOCUMENTED INTO UNIT SHIFT LOGS / IR'S. SUBSEQUENTLY, SHE FILED ANOTHER EMERGENCY GRIEVANCE CONTINUING HER COMPLAINTS AND WAS ADVISED "NOT EMERGENCY PER AR 740."

66. AT 9:05 A.M. SHE RESORTED TO PROTEST TO GAIN A CUSTODY SUPERVISOR'S ATTENTION TO THE ISSUE. SERGEANT CROHN ARRIVED, CONTACTED MEDICAL DEFENDANTS AND ASSURED HER SHE'D BE SEEN "NEXT WEEK" (WEEK OF 7/3 - 7/9) WHICH AGAIN SIMPLY AMOUNTED TO LIP SERVICE. ON JUNE 30, 2022 BLOOD DRAW WAS CONDUCTED FOR THYROID AND OTHER AMBIGUOUS REASONS PROVIDED HER. FOLLOWING INJURY FROM HER MAY 29, 2022 INCIDENT AND BY JULY 05, 2022, HER HAND HAD SWOLLED CAUSING SUBSTANTIAL REDNESS AND PAIN AND PROMPTING A "HANDDOWN". A DOE NURSE TOOK HER BLOOD PRESSURE AND AGAIN FALSELY ADVISED HER SHE'D SEE A PCP.

67. AS OF THE CURRENT DATE MS. DIXON HAS REMAINED AT HDSP FOR A "HIGHER" LOC FOR 9 MONTHS AND HAS ONLY

DESPITE HER CONDITIONS AND PLIGHT AGGRESSIVELY PERSISTING TO THE WORSE AND WITHOUT THE SLIGHTEST ATTENTION FROM A PCP. IN HER 9 MONTH INTERVAL AT HDSP, SHE HAS UNEQUIVOCALLY PLACED MEDICAL DEFENDANTS ON NOTICE OF THE SERIOUSNESS OF HER CONDITIONS AND THE RESULTING TORTURIOS WANTON PAINS AND SUFFERINGS SHE CONTINUES TO ENDURE.

68. NAMELY, SHE HAS SUBMITTED IN EXCESS OF 30 MKSPS AND OVER 35 GRIEVANCES PERTAINING TO HER TREATMENT AND CARE AND DEFENDANTS HAVE AND CONTINUE TO REBUFF HER DENYING HER ACCESS TO A PCP AND RESORTING TO SUCH ABSURDITY SO AS TO FALSELY LABEL HER A "HYPOCONDRIAC" DESPITE HER EXTENSIVE CLINICAL HISTORY<sup>71</sup>. MERELY IN FRAUDULENT EFFORTS TO EVADE THEIR CONSTITUTIONAL DUTY AND RESPONSIBILITY IN PROVIDING HER ADEQUATE AND TIMELY TREATMENT AND OUT OF SHEER SPITE AND RESENTMENT DESPITE HER COP CLASSIFICATION AND AS SHE CONTINUES TO DETERIORATE.

69. THE MEDICAL RESPONSES AND TREATMENTS PROVIDED MS. DIXON AT A "HIGHER" LOC OVER THE COURSE OF THE PAST 8 MONTHS GIVEN THE SEVERITY OF HER CONDITIONS AND PERSISTENT COMPLAINTS ARE NO LESS THAN DEPLORABLE, UNCONSCIONABLE, EGREGIOUS AND COMPLETELY UNACCEPTABLE AND ARE DEVOID OF ANY QUALITY OF CARE ACCEPTABLE WITHIN PRUDENT PROFESSIONAL STANDARDS. MOREOVER, NO SUCH GROTESQUE AND CALLOUSLY INSENSITIVE TREATMENT COULD FIND ANY SHELTER IN ANY MATURING CIVILIZED SOCIETY NOR BE CONSTRUED AS HUMANE AND DECENT AND IS SUFFICIENT TO SHOCK THE CONSCIENS OF ANY REASONABLE CITIZEN TO THE CORE.

7. PARTICULARLY, COPD/ASTHMA, HBP, POSITIVE BLOOD IN STOOL X 3, POSITIVE TABLETT TEST, 4 OT ABNORMAL EKGs, A SURGERY CORRECTED RIGHT WRIST, HISTORY OF KIDNEY FAILURE, POST-HEP C TREATMENT, ALARMING HOLTER MONITOR RESULTS AND THE MAY 29, 2022 INSTANCE RESULTING IN SERIOUS BODILY INJURY.

HOW MUCH PATIENCE MUST BE EXERTED AND HOW MUCH DELAY IS CONSTITUTIONALLY TOLERABLE IN THE CASE AT BENCH WHILE A DANGEROUS CULPRIT POSSIBLY CONSUMES MS. DIXON?

THIS CASE WARRANTS EMERGENCY JUDICIAL INTERVENTION.

**CLAIM 2**

1. State the constitutional or other federal civil right that was violated: FIRST AMENDMENT  
TO THE UNITED STATES CONSTITUTION.

2. **Claim 2.** Identify the issue involved. Check **only one**. State additional issues in separate claims.

Basic necessities       Medical care       Mail  
 Disciplinary proceedings       Exercise of religion       Property  
 Access to the court       Excessive force by officer       Retaliation  
 Threat to safety       Other: \_\_\_\_\_.

3. **Date(s) or date range** of when the violation occurred: 12/06/21 THRU CURRENT.

4. **Supporting Facts:** State as briefly as possible the FACTS supporting Claim 2. Describe exactly what **each specific defendant (by name)** did to violate your rights. State the facts clearly in your own words without citing legal authority or argument.

5. MS. DIXON REINCORPORATES BY REFERENCE ALL FACTS SET FORTH  
IN CLAIM I AS IF CONTAINED HEREIN AT FULL LENGTH.

6. FOR PURPOSES OF HER FIRST AMENDMENT CLAIM, MS. DIXON  
SUBMITS THAT THE ACTIONS DESCRIBED AT PARAGRAPHS 35,  
36, 45, 46, 47, 48, 50, 52, 53 AND 54 OF CLAIM I GIVE  
RISE TO FIRST AMENDMENT CLAIMS AGAINST DEFENDANTS  
EMIL, GISTEN, RONOS, JUSTIN, GARCIA, VALLE, RAYFORD,  
JARRETT, ZABEL, SAUKOFF, ASHCRAFT, OBLAK, MARTINEZ,  
LOPEZ-MAYA, JACKSON, BARRETT, STEWART, GUTIERREZ,  
GOBLEY, BERNALLES, RIVAS AND CERTAIN DOES.

#### E. PREVIOUS LAWSUITS

1. Have you filed any other lawsuits while incarcerated?  Yes  No
2. Has this Court or any other court designated you as subject to "three strikes" under 28 U.S.C. § 1915(g)?  Yes  No
3. If you have "three strikes" under 28 U.S.C. § 1915(g), does this complaint demonstrate that you are "under imminent danger of serious physical injury?"  Yes  No

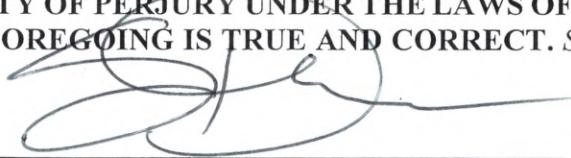
#### F. REQUEST FOR RELIEF

I believe I am entitled to the following relief: 1).EMERGENCY DECLARATORY JUDGMENT THAT THE DESCRIBED ACTS VIOLATE THE U.S. CONSTITUTION; 2).ISSUANCE OF EMERGENCY INJUNCTIVE RELIEF UPON MS. DIXON'S APPLICATION; 3).COMPENSATORY DAMAGES OF \$2,500,000.00; 4).NOMINAL DAMAGES OF \$1.00; 5).PUNITIVE DAMAGES OF \$750,000.00; 6).TRIAL BY JURY; 7).OTHER RELIEF DEEMED PROPER BY THIS COURT INCLUSIVE OF ALL OF MS. DIXON'S COSTS ASSOCIATED WITH THIS LITIGATION.

I understand that a false statement or answer to any question in this complaint will subject me to penalties of perjury. **I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES OF AMERICA THAT THE FOREGOING IS TRUE AND CORRECT. See 28 U.S.C. § 1746 and 18 U.S.C. § 1621.**

TONEY A. WHITE, III

(name of person who prepared or helped prepare this complaint if not the plaintiff)



(signature of plaintiff)

AUGUST 14, 2022

(date)

#### ADDITIONAL PAGES

You must answer all questions concisely in the proper space on the form. Your complaint may not be more than 30 pages long. It is not necessary to attach exhibits or affidavits to the complaint or any amended complaint. Rather, the complaint or any amended complaint must sufficiently state the facts and claims without reference to exhibits or affidavits. If you need to file a complaint that is more than 30 pages long, you must file a motion seeking permission to exceed the page limit and explain the reasons that support the need to exceed 30 pages in length.